



RICARDO SOLANO
rsolano@fklaw.com
973.877.6421

February 20, 2018

Hon. Karen M. Williams, U.S.M.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets Room 1050
Camden, NJ 08101

Re: *Freedom Mortgage Corporation v. LoanCare, LLC*,
1:16-cv-02569-RMB-KMW

Dear Magistrate Judge Williams,

We represent Defendant LoanCare in the above-captioned matter, which was placed on administrative termination pending mediation by the Court's order dated July 6, 2017, and recently reopened by the Court's order dated February 15, 2018. We write after conferring with counsel for Plaintiff Freedom Mortgage Company ("Freedom") regarding a proposed discovery schedule, in advance of the telephonic status conference scheduled for tomorrow, February 21, 2018.

LoanCare and Freedom jointly propose the following discovery schedule for this matter:

1. Motions to amend or to add parties to be filed by May 30, 2018.
2. Factual discovery to be completed by December 21, 2018.
3. Affirmative expert reports on Freedom's Claims and LoanCare's Counterclaims due on March 1, 2019.
4. Responding expert reports due on April 1, 2019.
5. Expert depositions to be completed by May 1, 2019.
6. Dispositive motions to be filed by June 14, 2019.

Freedom has additionally proposed that parties be allowed to file amended pleadings without leave of court until April 20, 2018. LoanCare does not agree with this suggestion, and does not consent to the filing of any amended pleading without an opportunity to review the proposed pleading in advance.

Hon. Karen M. Williams, U.S.M.J.

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Should Your Honor have any questions, or if Your Honor would like the above to be formatted as a proposed order, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Ricardo Solano Jr.

Ricardo Solano Jr.